## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Chapter 11 In re: Jointly Administered TELEGLOBE COMMUNICATIONS CORPORATION, et al., Case No. 02-11518 (MFW) Debtors. TELEGLOBE COMMUNICATIONS CORPORATION, et al.

Plaintiffs,

C.A. No. 04-CV-1266 (SLR) V.

BCE INC., et al.,

Defendants.

## REQUEST TO CHANGE FILING DATE

Defendants, by and through their undersigned counsel, hereby request that the filing date of Docket No. 228 be changed from March 15, 2006 to March 14, 2006.

Attached is the Affidavit of Margaret B. Whiteman in support of this request.

Respectfully submitted,

Young Conaway STARGATT & TAYLOR, LLP SHEARMAN & STERLING LLP

/s/ Pauline K. Morgan

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Stuart J. Baskin George J. Wade Jaculin Aaron 599 Lexington Avenue New York, NY 10022 (212) 848-4000

Counsel for the Defendants

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

|             | :                          | Chapter 11  |
|-------------|----------------------------|---|
| ATIONS      | ;<br>;<br>;                | Jointly Administered<br>Case No. 02-11518 (MFW)                         |
| Debtors.    | :                          |   |
| ATIONS      | x<br>:<br>:<br>:           |   |
| Plaintiffs, | :                          |   |
|             | :<br>:                     | C.A. No. 04-CV-1266 (SLR)   |
| Defendants. | :                          |   |
|             | Debtors. TIONS Plaintiffs, | Debtors. :  TIONS :  Plaintiffs, :  : : : : : : : : : : : : : : : : : : |

## AFFIDAVIT OF MARGARET B. WHITEMAN

| STATE OF DELAWARE    |    |   |
|----------------------|----|---|
| S                    | S: | ) |
| COUNTY OF NEW CASTLE |    | ) |

Margaret B. Whiteman, being duly sworn according to law, deposes and states as follows:

- 1. That she is counsel to the Defendants in the above-captioned proceeding.
- 2. That on March 14, 2006, the Defendants had technical difficulties with the CM/ECF system in connection with the required linking of the following document (the "Objection") to the Special Master's Final Decision on Plaintiffs' Motion to Compel Defendants to Produce Documents Withheld on the Basis of Privilege, as required by the CM/ECF program:
- DEFENDANTS' OBJECTIONS TO SPECIAL MASTER'S FINAL DECISION ON PLAINTIFFS' MOTION TO COMPEL DEFENDANTS TO PRODUCE DOCUMENTS WITHHELD ON THE BASIS OF PRIVILEGE [D.I. 228]
  - 3. Due to the technical difficulties described above, the Defendants were forced to file their Objection under an inaccurate docket event in an attempt to timely file the Objection.

059825.1001 DB01:2029963.1

The Objection was filed as a "Notice of Service" document two minutes after the 4. March 14, 2006 deadline to file the Objection. Thereafter, the parties entitled to notice were promptly served via email.

SWORN TO AND SUBSCRIBED before me, a Notary Public for the State and County aforesaid, this 15 day of March, 2006.

DEBBIE E. LASKIN **NOTARY PUBLIC** STATE OF DELAWARE My Commission Expires Dec. 21, 2008